

THREAT ASSESSMENT POLICY

Responding to Disruptive or

Threatening Behavior

Ave Maria School of Law

(Updated as of April 5, 2017)

Overview

Violence occurring at schools and work places across our country is one of the most concerning issues of the day. While Ave Maria School of Law (“Ave Law”) is a Catholic School, located in a peaceful and relatively secure area, we are not immune from the potential of violence occurring on our campus. Law school is one of the most intense and competitive endeavors one can undertake, with a commensurate amount of stress on all of its students, faculty, and staff. While most adequately cope, some may have trouble in managing their stress. The inability to cope can affect student-learning, compromise the ability to manage the behavior, and undermine instruction. When a student, staff, or faculty member manifests behaviors that are significantly disruptive or that threaten the safety and well-being of the student or others, it is imperative that Ave Law, as an institution, act swiftly and effectively.

Many campuses have instituted protocols for managing emergencies. Ave Law considers the safety and security of its students, faculty, staff, and campus community its highest priority. To ensure an atmosphere that fosters and promotes a safe and secure educational experience, the Law School is committed to maintaining an environment that is free of violence and threats of violence on campus and in other educational settings.

Generally, there are six principles in threat assessment. One, targeted violence is the end-result of an understandable process of thinking and behavior. Two, targeted violence stems from an interaction between the individual, the situation, the setting, and the target. Three, our school needs to adopt a mindset that is investigative, skeptical, and inquisitive. Four, effective threat assessment is based on facts, rather than characteristics or traits. Five, an “integrated systems approach” is best. And six, investigate whether or not an individual poses

a threat. The emphasis needs to stay focused on the current situation and whether there is a present danger.

The purpose of this guide is to provide the Threat Assessment Team (“TAT”) with response protocol for dealing with individuals who display disruptive and/or threatening behavior. Faculty, staff, and students have a responsibility to report, immediately, any situation that could possibly result in harm to anyone at the Law School.

As Ave Law administrators, we must gather and analyze information about the behavior and communications of any individual of concern. This information will help us make reasonable judgments about whether the individual of concern is moving along a path toward attack on an identifiable target.

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1. Threat Assessment Team ("TAT"):

a. Authorization. The Threat Assessment Team ("TAT") is authorized to conduct threat assessment inquiries when behavior of a staff, student, or faculty member deviates from the norm and may pose a threat.

b. Information. The TAT acts as an information collection center for concerns and for record-keeping. Information sharing must support the Ave Law threat assessment process. (1) The TAT will gather information from various sources during any inquiry. (2) The TAT will consider options for storing the information in an accessible format and keep information confidential in a central location.

c. Composition of Threat Assessment Team. The TAT will comprise of the President/Dean, Associate Dean for Academic Affairs, Associate Dean for Student and Administrative Affairs, Chief Human Resources, Title IX & Cleary Officer, Chaplain, a Faculty Member from the RWA or ACT Departments, a Mental Health Professional, a representative from Kent Security, and the Executive Assistant to the Dean.

d. Roles. The President/Dean will lead the team. The medical professional's primary role will be to provide advice on any possible signs of potential suicidal and/or homicidal behavior, as well as any concerns of violence or danger of harm. The Campus Security representative will ensure that the Kent Security team on campus is fully conversant with threat protocols and procedures, as well as awareness of any concerns with particular individuals. The Executive Assistant to the Dean will establish and maintain a central record-keeping system for the team. The Chaplain will help provide context and overall guidance (within the bounds of his pastoral duties), as well as act as a resource for any faculty, staff, and students related to the matter (again, within the bounds of his pastoral duties).

e. Training. The TAT will meet and train together quarterly, conducting tabletops and experiential exercises, and will familiarize themselves with Ave Law's policies, procedures, as well as best practices and lessons learned gathered from across the nation.

f. Mission. The primary mission of the team is to assess and manage situations of concern involving potential violence, to protect, secure, and eventually resolve.

****Note:** Suicide assessments must be conducted by a trained professional.

2. Relationships and Partnerships:

a. The TAT will develop relationships with the Collier County Sheriff's Department, including providing them the ability to access our on-campus camera system.

b. The TAT will also make itself familiar with counseling options for individuals of concern, and will have a mental health professional on its team.

3. Reporting, Awareness and Training:

a. The TAT will develop policies that require the reporting of any behavior of concern, threats to public safety, safety and welfare of any school personnel, the school community, or community at large.

Students must immediately report all concerns to staff or faculty. Staff and faculty must report concerns immediately to a TAT member, in a timely manner.

b. The TAT will encourage and develop multiple means of reporting concerns (i.e. tip-lines, calling, texting, open door policies, etc.).

c. The TAT will engender a school community that understands that breaking any code of silence must be accomplished, and that timely and comprehensive reporting keeps people safe. The TAT will create an environment where individuals feel encouraged and safe in bringing concerns forward.

d. TAT Members **shall** report all concerns related to them to the President and Dean.

4. Inquiry Steps:

a. The President/Dean shall consider whether to initiate an inquiry. The President/Dean should initiate an inquiry for any concern that appears to have any potential reasonable basis. At the initial stage, the President/Dean should consider: "How much time do we have?" Whether the information suggests the need for law enforcement assistance, if so, he should request that assistance immediately, and the TAT should send a message to the Ave Law community via the e2Campus, if appropriate.

b. When an individual's behavior or report of behavior and communications deviates from normal behavior as compared to their peers, and indicates concern as to the individual's safety or the safety of others, the TAT will initiate a threat assessment inquiry. The safety of the school, students, staff, faculty and the community is a priority consideration. At the same time, the TAT members should exercise care to ensure that an individual of concern is treated appropriately, given that any allegations regarding the behavior or perceived dangerousness may be unfounded.

c. Basic threat assessment inquiry steps include:

(1). President/Dean decides which portions of the TAT to Assemble and considers whether the entire TAT needs to assemble.

(2). Gather information.

(3). Use multiple data sources.

(4). Organize and analyze information.

(5). Determine the level of concern leading to an action plan.

(6). Develop an action and support plan. Decide whether entire TAT needs to assemble, if they have not as of this point.

(7). Document the threat assessment and keep records.

(8). Continue monitoring the individual of concern and the effectiveness of the plan.

5. Gathering Information:

- a. What were the facts that drew attention to the individual, the situation and the targets?
- b. How did the individual come to the attention of school officials?
- c. What were the triggering events and possible targets?
- d. What behaviors and/or communications were reported, and by whom?
- e. What was the situation?
- f. Who, if anyone, witnessed the reported behavior of concern?
- g. What was the context for the reported behavior, i.e. what else was going on at the time of the reported behavior?

h. Information about the individual:

(1) Identifying Information: 1. Name 2. Physical description (hair color, scars, clothes, etc.) 3. Date of birth 4. Identification numbers: student ID, etc.

(2) Background Information: 1. Residences 2. Family/home situation 3. Academic performance 4. Criminal behavior and law enforcement history 5. Social networks 6. History of relationships and conflicts 7. History of harassing others or of being harassed by others 8. History of violence toward self and others 9. History of having been a victim of violence or bullying 10. Known attitudes toward violence 11. Triggering events 12. Possible targets 13. Mental Health/substance abuse history 14. Access to and use of weapons 15. History or grievances and grudges 16. History of response to interventions 17. History of inhibitors to aggression

(3) Current Life Information: 1. Present stability of living and home situations 2. Nature and quality of current relationships and personal support 3. Recent losses or losses of status (shame, humiliation, recent breakup or loss of significant relationship) 4. Current grievances or grudges 5. Perceptions of being treated unfairly 6. Known difficulty coping with a stressful event 7. Any progression in social, academic, behavioral, or psychological functioning 8. Recent hopelessness, desperation, and/or despair, including suicidal thoughts, gestures, actions, or attempts 9. Pending crises or change in circumstances 10. Note whether the individual has any trusting relationships with others who are emotionally available to him or her.

i. Information about boundary probing and “attack-related” behaviors:

(1) Examination of the thinking and behaviors of school shooters suggests that most attacks are preceded by discernible behaviors, as the individual plans or prepares for the attack. These behaviors are referred to as boundary probing or attack-related behaviors.

(2) Behaviors that should raise concern about potential violence include:

- Ideas or plans about injuring him/herself or attacking a school or persons at school;
- Communications (including via any technological means) or writings that suggest that the individual has an unusual or worrisome interest in school attacks;

- Comments that express or imply the individual is considering mounting an attack at school, or has made a threat, written or verbal, to his safety or the safety of others;
- Recent weapon-seeking behavior, especially if weapon-seeking is linked to ideas about attack or expressions about interest in attack;
- History of concerning behavior;
- Communications or writings suggesting the individual condones or is considering violence to redress a grievance or solve a problem; and,
- Rehearsals of attacks or ambushes.

j. Motives. Communicated motives for attack behaviors to self or others have included:

- (1) Revenge for a perceived injury or grievance;
- (2) Yearning for attention, recognition, or notoriety;
- (3) A wish to solve a problem otherwise seen as unbearable; and,
- (4) A desire to die or be killed.

NOTE: Knowledge of the communications or writings of an individual of concern may help the threat assessment team in evaluating the risk of targeted violence. Understanding the circumstances that may have prompted an individual to consider attacking others may permit authorities to direct the individual away from violence.

k. Target Selection. Information about an individual's potential target may provide clues to the individual's motives, planning and attack related behaviors.

6. Use Multiple Data Sources.

a. Obtain School Information.

A school threat assessment inquiry should begin with what is known about the concerned individual from school records, interviews of those who are most familiar with the individual, and other information such as history from previous schools. Out of school information, including the student/faculty/staff file, technology sources, parents/families' information, law enforcement, and mental health records, if available, are also important. In utilizing information from school records in a threat assessment inquiry, the TAT team may share information among team members, and with law enforcement for safety purposes. Concerning sharing information with any other entities, the TAT should analyze the release of the information to ensure it complies with applicable policies and relevant laws.

Answers to the following questions may be drawn from information at school:

- (1) Is the individual well known at the school?

- (2) Has the individual come to attention for any behavior of concern? If so, what? (Email, texting, website, posters, papers, class assignments, rule-breaking, violence, harassment, adjustment problems, depression or despair, acting-out behavior, etc.)
- (3) Has the individual experienced serious difficulties or been in distress?
- (4) Is there anyone with whom the individual typically shares worries frustrations and/or sorrows?
- (5) Is there information that the individual has considered ending his or her life?
- (6) Has the individual been a victim and/or initiator of hostile, harassing or bullying behavior directed toward other students, teachers, or other staff?
- (7) Is the individual known to have an interest in weapons? If so, has he or she made efforts to acquire or use weapons? Does the individual live in a home where there are weapons (whether or not the weapons are secured)?

b. Interview the Individual of Concern:

- (1) Interview the individual of concern, if possible. Typically, more than one TAT member should be present for an interview.
- (2) The primary purpose of the interview is to learn about the individual's thinking, motives, and behavior. Keep the tone of the interview professional, neutral, and non-confrontational, rather than accusatory or judgmental. Keep safety as a priority while waiting for and during the interview.
- (3) Issues for the TAT to consider:
 - (a) Whether or when to invite spouse/parents/guardians to be present during an interview;
 - (b) Whether and how to use information from an interview for criminal justice proceedings;
 - (c) Whether and when legal representation should be allowed, offered or provided; and,
 - (d) The search of an individual in any context is a sensitive and complex issue that the TAT should be exam thoroughly with legal counsel.
- (4) Conducting an interview with an individual of concern, the TAT should:
 - Be well acquainted with the facts that brought the individual to the attention of school administrators and others.
- (5) Review available information concerning the individual's background, interests, and behaviors. Knowledge of background information concerning the individual prior to the interview may help the TAT judge whether the individual is forthcoming and straightforward. Generally, the TAT should ask the individual directly about his or her intentions. An interview

can also send the message to the individual that the TAT has noticed the behavior and has concern.

(6). Prior to the interview, the TAT should give consideration as to who would best serve as the person interviewing the subject. Direct supervisors should NOT interview their employees.

c. Interview Others Who Know the Individual of Concern

(1) The TAT should ask Individuals who know the person of concern about communications or other behaviors that may indicate the individual of concern's ideas or intent.

(2) The focus of these interviews should be factual:

(a) What was said? To whom?

(b) What was written? To whom?

(c) What was done?

(d) When and where did this occur?

(e) Who else observed this behavior?

(f) Did the individual say why he or she acted as they did?

d. Interview Family Members. If there is a spouse, interview the spouse. If not, reach out to parents. Family members may be protective, frightened and/or embarrassed about the inquiry and the possibility that one of their own family members may be contemplating a violent act. The TAT therefore should make it clear that the objective of the threat assessment inquiry is simply to help prevent targeted school violence and diminish the chance that the individual and possibly others would be harmed. The TAT seeks to help the individual of concern and protect the safety of others. The TAT should seek help from family members in understanding the individual's actions and interests. At the same time, be cognizant that it is possible that even the family members may or may not know much about the individual of concern's thinking and behavior.

(1) Questions for spouses and parents should focus on the individual's behaviors and communications, especially those that might be attack-related.

(2) Spouses and Parents should be encouraged to explore all methods of communications, including internet messaging, cell phone communications, and postings on social network sites such as Facebook and Twitter.

(3) TAT should explore the individual's interest in weapons, as well as his or her access to weapons.

e. Obtain Outside Sources of Information. Obtain information from sources such as community organizations, clubs, other schools, and anonymous reporting lines.

f. Interview any Known Potential Targets. The primary purpose of that interview is to gather information about any possible situation of concern.

7. Organize and Analyze.

a. Determine the Level of Concern and develop an Action Plan:

(1). Low Concern:

(1) If there is enough reliable information to answer the 11 Key Questions, and

(2) The weight of the information is convincing that the individual does not pose a threat of targeted school violence nor display any indicators of proactive violence, then the threat assessment team may conclude the threat assessment inquiry at this time, and continue monitoring.

(2). Medium Concern:

Referral and Planning of Support Services and Monitoring – The TAT may decide to close the assessment process, but conclude that the individual is still in need of assistance with problems or behaviors. The TAT needs to develop an Action and Support Plan and document it. In this case, the team should work with community partners, and others to ensure that these individuals receive assistance, continued support, and monitoring. The TAT should review the plan periodically while the individual remains at Ave Law.

c. High Concern:

Referral to Law Enforcement for Investigation or to Mental/Behavioral Health Professionals for Immediate Evaluation and/or Hold – when information suggests that a crime has occurred or there is cause for a mandatory reporting.

(1) If there is sufficient information for the TAT to be reasonably certain that the individual poses a threat to self or others, or

(2) The individual appears to be on a path to attack or self-harm, then

(3) The team should immediately refer to the appropriate law enforcement agency for a threat assessment investigation or mental/behavioral professionals for evaluation and/or hold.

(4) The TAT will conduct a re-entry meeting prior to the individual returning to school to develop a school and community based Action and Support Plan. The plan should establish review dates, provide connection to district and community mental health professionals and provide monitoring measures.

As the Threat Assessment Inquiry moves to an Investigation Status, and law enforcement has been notified, the team might continue to ask themselves the following questions:

- (1) Does the information collected prompt more concern or less concern about the possibility that the individual is moving on a path of attack or self-harm?
- (2) What information might prompt less concern?
- (3) What information might heighten concern?
- (4) What options exist for intervening in the behavior of or redirecting the individual away from ideas of or plans for a school attack?
- (5) How should potential targets be contacted, warned, and protected?
- (6) Consult with legal counsel on Ave Law's "duty to warn and/or protect."

8. Develop an Action and Support Plan

An Action and Support Plan can be developed for any situation, but should be developed if evaluation indicates medium or high level concern. The purpose is to protect and aid possible targets, and to provide support and guidance to help the individual of concern deal successfully with his or her problems. The plan also aids in monitoring of the individual in the short-term and long-term. Strategies selected should have the best potential for long-term preventative power. The focus of the process is to connect the individual of concern using a support system that reduces the likelihood of future threatening behavior.

- a. Select actions and interventions related to the level of concern.
- b. Notify the potential target.
- c. Consider the history of previous actions, consequences, and interventions and evaluate their effectiveness.
- d. Start with as intense of a plan as needed, and then adjust based on progress. Timelines for review of progress can be short, if needed.
- e. Specify consequences, monitoring and supervision strategies, support for skill development and relationship building.
- f. Maximize the resources: family, community agencies, other intervention providers, etc. Use community collaborative teams for intervention planning or further assessment, as indicated.
- g. Build-in formal follow-up meetings to review progress and response to the plan.
- h. Adjust plans as necessary.

9. Document the Threat Assessment and Keep Records

- a. Regardless of the outcome of the Threat Assessment Inquiry, the TAT should document the behavior of concern, the inquiry process, and any actions taken. Ave Law will maintain a central information record-keeping with the Executive Assistant to the Dean.
- b. It also is important to document the reasoning that led the decision of the TAT.
- c. A well-documented record provides baseline information and can be useful if the individual of concern comes to authorities' attention again, or if at some point in the future, investigators or Ave Law personnel need to determine whether the subject has changed patterns of thinking and behavior.

10. Continue Monitoring the Individual and the Effectiveness of the Action and Support Plan

- a. Transition the short-term plan to a longer-term plan, as indicated.
- b. Reevaluate the plan and the system process, as needed.

APPENDIX 1: KEY QUESTIONS

A Summary of the Secret Service Eleven Key Questions

How should the information from a threat assessment inquiry be organized and analyzed? Information from research and interviews conducted during a threat assessment inquiry can be guided by the following eleven key questions:

1. WHAT ARE THE INDIVIDUAL'S MOTIVES AND GOALS?
2. HAVE THERE BEEN ANY COMMUNICATIONS SUGGESTING IDEAS OR INTENT TO ATTACK OR FOR SELF-HARM?
3. HAS THE SUBJECT SHOWN INAPPROPRIATE INTEREST IN SCHOOL ATTACKS OR ATTACKERS, WEAPONS, INCIDENTS OF MASS VIOLENCE OR SIGNS OF AN INTENT TO COMMIT SELF-HARM?
4. HAS THE INDIVIDUAL ENGAGED IN ATTACK-RELATED OR SELF-HARM BEHAVIORS?
5. DOES THE INDIVIDUAL HAVE THE CAPACITY TO CARRY OUT THE ACT?
6. IS THE INDIVIDUAL EXPERIENCING HOPELESSNESS, DESPERATION OR DESPAIR?
7. DOES THE INDIVIDUAL HAVE A TRUSTING RELATIONSHIP WITH SOMEONE AT AVE LAW?
8. DOES THE INDIVIDUAL SEE VIOLENCE AS AN ACCEPTABLE OR DESIRABLE WAY TO SOLVE PROBLEMS?
9. IS THE INDIVIDUAL'S CONVERSATION AND "STORY" CONSISTENT WITH THEIR ACTIONS?
10. ARE OTHER PEOPLE CONCERNED ABOUT THE INDIVIDUAL'S POTENTIAL FOR VIOLENCE OR SELF-HARM?
11. WHAT CIRCUMSTANCES MIGHT AFFECT THE LIKELIHOOD OF VIOLENCE OR SELF-HARM?

Use the information gathered to help determine the seriousness of the concern and to develop the Action and Support Plan.

Explanation of the Secret Service Eleven Key Questions

1. WHAT ARE THE INDIVIDUAL'S MOTIVE(S) AND GOALS?

a. What motivated the individual to make the statements or take the actions that caused him or her to come to attention? b. Does the situation or circumstance that led to these statements or actions still exist? c. Does the individual have a major grievance or grudge? Against whom? d. What efforts have been made to resolve the problem and what has been the result? Does the potential attacker feel that any part of the problem is resolved or see any alternative?

2. HAVE THERE BEEN ANY COMMUNICATIONS SUGGESTING IDEAS OR INTENT TO ATTACK? a. What, if anything, has the individual communicated to someone else (targets, friends, other students, teachers, family, others) or written in a diary, journal, or website concerning his or her ideas and/or intentions?

3. HAS THE SUBJECT SHOWN INAPPROPRIATE INTEREST IN ANY OF THE FOLLOWING? a. School attacks or attackers b. Weapons (including recent acquisition of any relevant weapon) c. Incidents of mass violence (terrorism, workplace violence, mass murderers)

4. HAS THE INDIVIDUAL ENGAGED IN ATTACK-RELATED BEHAVIORS? THESE BEHAVIORS MIGHT INCLUDE: a. Developing an attack idea or plan b. Making efforts to acquire or practice with weapons c. Casing or checking out possible sites and areas for attack d. Rehearsing attacks or ambushes

5. DOES THE INDIVIDUAL HAVE THE CAPACITY TO CARRY OUT AN ACT OF TARGETED VIOLENCE? a. How organized is the individual's thinking and behavior? b. Does the individual have the means, e.g., access to a weapon, to carry out an attack?

6. IS THE INDIVIDUAL EXPERIENCING HOPELESSNESS, DESPERATION AND/OR DESPAIR? a. Is there information to suggest that the individual is experiencing desperation and/or despair? b. Has the individual experienced a recent failure, loss and/or loss of status? c. Is the individual known to be having difficulty coping with a stressful event? d. Is the individual now, or has the individual ever been, suicidal or "accident-prone"? e. Has the individual engaged in behavior that suggests that he or she has considered ending their life?

7. DOES THE INDIVIDUAL HAVE A TRUSTING RELATIONSHIP WITH SOMEONE AT AVE LAW? a. Does this individual have at least one relationship with someone at Ave Law that he or she can confide in and believes will listen without judging or jumping to conclusions? (Individuals with trusting relationships may be directed away from violence and despair and toward hope.) b. Is the individual emotionally connected to – or disconnected from – others? c. Has the individual previously come to someone's attention or raised concern in a way that suggested he or she needs intervention or supportive services?

8. DOES THE INDIVIDUAL SEE VIOLENCE AS ACCEPTABLE – OR DESIRABLE – OR THE ONLY WAY TO SOLVE PROBLEMS?

a. Does the setting around the individual (friends, fellow students, parents, teachers, adults) explicitly or implicitly support or endorse violence as a way of resolving problems or disputes?

b. Has the individual been “dared” by others to engage in an act of violence?

9. IS THE INDIVIDUAL’S CONVERSATION AND “STORY” CONSISTENT WITH HIS OR HER ACTIONS?

a. Does information from collateral interviews and from the individual’s own behavior confirm or dispute what the individual says is going on?

10. ARE OTHER PEOPLE CONCERNED ABOUT THE INDIVIDUAL’S POTENTIAL FOR VIOLENCE?

a. Are those who know the individual concerned that he or she might take action based on violent ideas or plans?

b. Are those who know the individual concerned about a specific target?

c. Have those who know the individual witnessed recent changes or escalations in mood and behavior?

11. WHAT CIRCUMSTANCES MIGHT AFFECT THE LIKELIHOOD OF AN ATTACK?

a. What factors in the individual’s life and/or environment might increase or decrease the likelihood that the individual will attempt to mount an attack at school?

b. What is the response of other persons who know about the individual’s ideas or plan to mount an attack? (Do those who know about the individual’s ideas actively discourage the individual from acting violently, encourage the individual to attack, deny the possibility of violence, or passively collude with attack, etc.?)

Adapted from: Fein, R., Vossekuil, B., Pollack, W., Borum, R., Modzeleski, W., & Reddy, M. (2002). Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates. Washington, DC: United States Department of Education, Office of Safe and Drug Free Schools Program and U.S. Secret Service, National Threat Assessment Center. A complete copy of the guide is available online at <http://www2.ed.gov/admins/lead/safety/threatassessmentguide.pdf>.

ADDENDUM 2: Student Discipline Procedures & Title IX

1. Student Discipline.

The Associate Dean for Academic Affairs will assess whether any situation justifies commencing Honor Code and Student Disciplinary Procedures under the Student Handbook.

The Associate Dean for Academic Affairs must give serious consideration when any student who, following clear warning, persists in exhibiting disruptive behavior or who threatens to commit or commits an act of violence or abuse. Students warned of the need to correct disruptive behavior and yet continue that behavior, are of particular concern. Corrective measures are also appropriate when a student commits serious misconduct.

2. Title IX.

The Chief, Human Resources (HR) and Cleary Officer will assess whether there are any concerns related to sexual harassment, sexual assault and other actions that may fall under Ave Law's obligations under Title IX. If there are concerns, the Chief, HR, will refer the matter to the Title IX Coordinator (if held by a separate individual than the Chief, HR).

APPENDIX 3: FERPA

FERPA allows for various exceptions to privacy protection that have relevance to threat assessment inquiries. Specifically, Section 99.36 (December, 2008), sets forth when disclosure may occur in health and safety emergencies:

(a) An [educational agency or institution](#) may disclose personally identifiable information from an education [record](#) to appropriate parties, including [parents](#) of an [eligible student](#), in connection with an emergency if knowledge of the information is necessary to protect the health or safety of the student or other individuals.

(b) Nothing in FERPA shall prevent an [educational agency or institution](#) from -

(1) Including in the [education records](#) of a student appropriate information concerning disciplinary action taken against the student for conduct that posed a significant risk to the safety or well-being of that student, other students, or other members of the school community;

(2) Disclosing appropriate information maintained under [paragraph \(b\)\(1\)](#) of this section to teachers and school officials within the agency or institution who the agency or institution has determined have legitimate educational interests in the behavior of the student; or

(3) Disclosing appropriate information maintained under [paragraph \(b\)\(1\)](#) of this section to teachers and school officials in other schools who have been determined to have legitimate educational interests in the behavior of the student.

(c) In making a determination under [paragraph \(a\)](#) of this section, an [educational agency or institution](#) may take into account the totality of the circumstances pertaining to a threat to the health or safety of a student or other individuals. If the [educational agency or institution](#) determines that there is an articulable and significant threat to the health or safety of a student or other individuals, it may disclose information from [education records](#) to any person whose knowledge of the information is necessary to protect the health or safety of the student or other individuals. If, based on the information available at the time of the determination, there is a rational basis for the determination, the Department will not substitute its judgment for that of the [educational agency or institution](#) in evaluating the circumstances and making its determination.

FERPA does not include anything we, or another, personally observes and shares with us. FERPA concerns student records.

APPENDIX 4: CONTACT INFORMATION

Name	Contact Information
<p>President & Dean Kevin Cieply</p>	<ul style="list-style-type: none"> Office Number: (239) 687 – 5305
<p>Chaplain Monsignor McGrath</p>	<ul style="list-style-type: none"> Office Number: 239-687 – 5331
<p>Associate Dean for Academic Affairs Tim Tracey</p>	<ul style="list-style-type: none"> Office Number: 239-687-5305
<p>Associate Dean of Student and Administrative Affairs Kaye Castro</p>	<ul style="list-style-type: none"> Office Number: (239) 687 - 5343
<p>Chief HR & Cleary Officer Melissa Gamba</p>	<ul style="list-style-type: none"> Office Number: (239) 687-5345
<p>Executive Asst. to Dean Pam Kramer</p>	<ul style="list-style-type: none"> Office Number: (239) 687 - 5305
<p>Director of RWA Maureen Milliron</p>	<ul style="list-style-type: none"> Office Number: (239) 687 – 5368
<p>Kent Security Officer Valerie Scott</p>	<ul style="list-style-type: none"> Office Number: (239) 305 713-0767
<p>Mental Health Counselor Dr. Terrence Kimper</p>	<ul style="list-style-type: none"> Office Number: (239) 398 - 0009

Appendix 5: Counseling Resource List

Counseling Services

Family or Child Services

Religious, Race or Gender Specific

Crisis Centers

Counseling and Psychological Associates